

STATE OF IOWA
DEPARTMENT OF COMMERCE
UTILITIES BOARD

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| <p>IN RE:</p> <p>REVIEW OF ELECTRIC INTERCONNECTION OF DISTRIBUTED GENERATION FACILITIES RULES [199 IAC CHAPTER 45]</p> | <p>DOCKET NO. RMU-2016-0003</p> <p>ADDITIONAL COMMENTS SUBMITTED ON BEHALF OF IOWA ASSOCIATION OF ELECTRIC COOPERATIVES</p> |
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COMES NOW the Iowa Association of Electric Cooperatives (“IAEC”), by and through the undersigned attorney, and hereby submits the following comments in accordance with the Order Requesting Additional Comments (“Order”) issued October 18, 2016. As the Board is aware, the IAEC is a trade association representing 36 distribution cooperatives that provide electric service at retail to member consumers in their assigned service areas in the state of Iowa and seven generation and transmission cooperatives that provide wholesale electric service to the distribution cooperative members in the state of Iowa. The IAEC is participating in this docket on behalf of its members; however, any one of the IAEC's members may also file comments of their own.

The Board’s Order specifically requested comments on proposals made by Interstate Power and Light Company (“IPL”). IAEC has reviewed the proposed revisions to 199 IAC 45.2 and 199 IAC 45.1 and is generally supportive of IPL’s proposed amendments set forth in the Order. IAEC also supports IPL’s recommendation to include certain changes to the interconnection agreements/forms as described in IPL’s September 6, 2016 Statement of Position on Proposed Rule Change – Chapter 45 and Comments on Proposed Forms and Processes, pp. 6-11 (Docket No. RMU-2016-0003).

WHEREFORE, the IAEC appreciates the opportunity to provide comments regarding the potential revisions to the Board's Chapter 45 rules and the forms required thereby. The IAEC looks forward to continuing to participate in this docket, and update its comments in response to those submitted by other stakeholders based on the schedule set forth in the Order.

Respectfully submitted,

SULLIVAN & WARD, P.C.

By /s/ Dennis L. Puckett

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ATTORNEYS FOR THE IOWA ASSOCIATION
OF ELECTRIC COOPERATIVES

CERTIFICATE OF SERVICE

I hereby certify that I have filed this pleading with the Board's Executive Secretary through the Electronic Filing System (EFS) this 7th day of November, 2016.

/s/ Dennis L. Puckett